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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING JOINT
SUBMISSION RE: SEALING PORTIONS
OF ORDER ON PLAINTIFFS' MOTION
FOR SANCTIONS FOR DISCOVERY
MISCONDUCT (DKT. 588)**

Referral: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is the Parties' Joint Submission Re: Sealing Portions of Order on Plaintiffs' Motion for Sanctions for Discovery Misconduct (Dkt. 588). Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Order on Plaintiffs' Motion for Sanctions for Discovery Misconduct (Dkt. 588)	<p>GRANTED as to Portions of Order at:</p> <p>Pages 3:2, 3:23, 3:26</p> <p>GRANTED as to Portions of Exhibit A to Order at:</p> <p>Pages 4:5, 4:8-9, 4:19-20, 5:3, 5:5, 5:17, 6:11, 6:20, 6:23, 7:2-26, 13:1-3, 13:10-13, 16:10-11, 17:16, 17:20, 19:5, 19:7, 21:9, 21:11, 21:13-15, 21:17, 21:19, 21:23-24, 22:2-3, 22:10, 22:12, 22:17, 23:6, 24:2, 24:18, 26:3-5, 27:24, 36:8-10, 36:12, 36:15, 36:17, 36:26, 37:3, 37:7, 37:14</p>	Narrowly tailored to protect confidential technical information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

SO ORDERED.

DATED: _____

 THE HONORABLE SUSAN VAN KEULEN
 United States Magistrate Judge